

Easton  
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criminal  
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team

August 23, 2019

Honorable Elizabeth A. Wolford  
United States District Court Judge  
100 State Street  
Rochester, New York 14614

Re: *United States v. Jason Haynes*  
18-cr-6015

Dear Judge Wolford:

On July 25, 2019, Jason Haynes was sentenced by the Court to six months imprisonment at the Bureau of Prisons. His release was continued pending a self-surrender date. Mr. Haynes has recently received a letter from the Marshals dated August 13, 2019 setting a self-surrender date of September 16, 2019 at FPC Montgomery, Alabama.

I write to request a two month adjournment of the self-surrender date. As the Court is aware, Mr. Haynes has struggled with a series of medical issues regarding his shoulder, neck and ribs as a result of a motor vehicle accident. Over the past two years he has had five surgeries of various dimensions, one resulting in the removal of his first rib. His latest surgery was on his shoulder and performed on June 28th.

On August 21, 2019, Mr. Haynes had a follow-up visit with a Physician's Assistant at Southeast Orthopedic Specialists, the practice group whose surgeon performed the latest operation. Mr. Haynes received a cortisone injection, his medication regimen was continued, and physical therapy was ordered to be continued. A follow-up visit with the surgeon was scheduled for September 26, 2019, which was the earliest available date.

An adjournment of two months will allow the consult with the surgeon and also hopefully decrease the medical disruption that a prison term will cause Mr. Haynes. It may also increase the chances of him serving his sentence at Montgomery as opposed to being transferred to a BOP medical facility further from his family (a factor the Court determined to be significant in recommending that Mr. Haynes serve his sentence at a facility close to his home).

I have spoken to AUSA Richard Resnick regarding this request, and the government has no objection.

Thank you for your consideration of this matter

Respectfully,  
William T. Easton

cc, Richard Resnick AUSA  
Charles F. Salina, USM

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